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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

21	UNITED STATES OF AMERICA,)	No. CR-12-0119 SI
)	
22	Plaintiff,)	DEFENDANTS' UNOPPOSED <i>EX PARTE</i>
)	MOTION TO SEAL EXHIBITS AND
23	v.)	MOTION TO SUPPRESS WIRETAP
)	EVIDENCE; DECLARATION OF
24	BENJAMIN CAMPOS-GONZALEZ, et. al.,)	COUNSEL; [PROPOSED] ORDER
25)	
	Defendants.)	
26)	
)	
27)	Court: Honorable Susan Illston
28)	

1 Defendant BENJAMIN CAMPOS-GONZALEZ, by and through his counsel Stuart Hanlon
2 and on behalf of all defendants joining in the motion to suppress, hereby moves *ex parte* for an order
3 sealing Mr. Campos-Gonzalez's NOTICE OF MOTION AND MOTION TO SUPPRESS WIRETAP
4 EVIDENCE; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION
5 TO SUPPRESS; EXHIBITS TO MOTION TO SUPPRESS on the basis that the above pleadings
6 include extensive identifying information concerning third parties and cooperating witnesses.
7 Though this motion is filed *ex parte*, the Government has been notified of the motion and has
8 indicated it does not object.
9

10 IT IS RESPECTFULLY REQUESTED that Mr. Campos-Gonzalez's Motion and the
11 document s attendant thereto be filed under seal by the Clerk of the Court and not unsealed without
12 further order of the Court.
13

14 Dated: July 25, 2013.

Respectfully submitted,

15 /S/ Stuart Hanlon
16

17 STUART HANLON
18 Attorney for Defendant
19 BENJAMIN CAMPOS-GONZALEZ
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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

21	UNITED STATES OF AMERICA,)	No. CR-12-0119 SI
)	
22	Plaintiff,)	DECLARATION OF COUNSEL IN
)	SUPPORT OF DEFENDANTS'
23	v.)	UNOPPOSED <i>EX PARTE</i> MOTION TO
)	SEAL EXHIBITS AND MOTION TO
24	BENJAMIN CAMPOS-GONZALEZ, et. al,)	SUPPRESS WIRETAP EVIDENCE;
25)	DECLARATION OF COUNSEL;
26	Defendants.)	[PROPOSED] ORDER
)	
27)	
28)	Court: Honorable Susan Illston

DECLARATION OF COUNSEL

I, STUART HANLON, declare under penalty of perjury as follows:

1. I am an attorney admitted to practice law in the State of California and in the Northern District of California. I am the counsel of record for defendant BENJAMIN CAMPOS-GONZALEZ in the above-captioned matter.

2. Mr. Campos-Gonzalez's Motion to Suppress Wiretap Evidence and the Exhibits to be filed with the motion include extensive information, such as dates of birth, telephone numbers and addresses, that identify citizen witnesses, third parties, and government witnesses. The documents also include matters that may be covered by the protective order the Court issued in this case.

3. I am informed and believe that Counsel for defendants has discussed the proposed under seal filing with counsel for the government Acadia Senise, and that AUSA Senise indicated the Government does not object to the motion and concurs that the pleadings should be filed under seal.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 25th day of July, 2013, in San Francisco, California.

/s/ Stuart Hanlon

STUART HANLON
Attorney for Defendant
BENJAMIN CAMPOS-GONZALEZ


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA) No. CR-12-0119 SI
)
Plaintiff,)
) **SEALING ORDER**
v.)
)
BENJAMIN CAMPOS-GONZALEZ, et al.,) ~~**FILED UNDER SEAL**~~
)
Defendants. _____)
)
)

GOOD CAUSE APPEARING THEREFORE upon the motion of Defendant Benjamin Campos-Gonzalez and the declaration of counsel Stuart Hanlon in support thereof;

IT IS HEREBY ORDERED that the following documents received by the Clerk of the Court on July 26, 2013, be filed under seal and not unsealed without further order of the court: 1) **Defendants' Notice of Motion and Motion to Suppress Wiretap Evidence**; and 2) **Exhibits to Defendants' Motion to Suppress Wiretap Evidence.**

Dated: July 7/26 2013.



Hon. SUSAN ILLSTON
United States District Court Judge